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From: Koch, Kristine
Sent: Monday, July 21, 2014 2:54 PM
To: Bob Wyatt (rjw@nwnatural.com); Jim McKenna (jim.mckenna@verdantllc.com)
Cc: Jennifer Woronets; Sheldrake, Sean (sheldrake.sean@epa.gov); Cora, Lori; Cohen, Lori; Yamamoto, Deb
Subject: LWG Comments on Revised FS Section 2

Bob and Jim,

This email is to respond to some of the information you provided to EPA on June 19, 2014, regarding LWG comments on the revised FS Section 2. We have discussed this issue so you should not be surprised by this response.

The following statements were made by the LWG in the June 19 information:

Attachment 1 Table 2

PCBs – “The data used to determine background are not representative of reasonable background conditions in Portland Harbor (see Attachment 2).”

Attachment 3

“Calculate sediment background values based on statistical assessments of upstream bedded sediment data that are based on technically sound methods consistent with standard accepted statistical practices and EPA’s guidance.”

“9 - SEDIMENT BACKGROUND STATISTICS

EPA is using RI Section 7 sediment background values based on inappropriate statistical analyses of upstream bedded sediment data for comparison to risk-based sediment PRGs in the revised FS Section 2 and potentially other purposes for later sections of the revised FS. During the draft final RI Section 7 discussions on sediment background, the LWG provided numerous technical objections to EPA’s directed changes to the calculation of upstream bedded sediment background values, including issues related to organic carbon normalization and the selection of outliers (among other issues). The LWG accepted EPA’s RI directions on background solely for the purposes of completing RI Section 7. For the purposes of the revised FS, the LWG disagrees for similar reasons that the RI background statistics were calculated appropriately and therefore represent technically accurate or reasonable background values for use in the revised FS.

As noted above, EPA guidance (EPA 2005) is clear that PRGs based on background (or risk) should be achievable by the sediment remedy itself. EPA’s proposed background values based on inappropriately derived upstream bedded sediment statistics are unlikely to represent achievable levels for the Site. In the near future, the LWG will present to EPA under separate cover additional information on technically appropriate methods for calculating background statistics from upstream bedded sediment data that follows standard accepted statistical practices and are consistent with EPA’s guidance. In addition, per Attachment 2, the LWG urges EPA to calculate equilibrium- based values for use throughout the revised FS as more representative of likely achievable background levels for the Site.”

It seems from these statements that the LWG now believes (1) the LWG failed to collect adequate data for its stated purpose of establishing background concentrations for Portland Harbor, (2) the methodology to which the LWG agreed to in Section 7 of the RI to develop background in the RI was not based on EPA guidance and accepted practices, (3) and that the background concentrations should be recalculated in the FS.

With reference to the three points above,

- It is unfortunate that the LWG believes the data they collected are inadequate to develop background concentrations for the RI/FS. EPA was of the understanding that the LWG considered the data collected to be sufficient for the purposes LWG stated in its UPRIVER AND MULTNOMAH CHANNEL SEDIMENT EVALUATION AND FIELD SAMPLING PLAN TECHNICAL APPROACH (May 21, 2007), as well as several other documents submitted to EPA by the LWG. In consultation with EPA, DEQ, and the tribes, the upriver reach of the Lower Willamette River extending from RM 15.3 to 28.4 was selected as the reference area for determining background sediment concentrations. LWG has not presented any new information learned since the data was taken that would indicate the data is insufficient.
- EPA believes the data is sufficient for purposes of calculating background, and the methodology used to determine background concentrations in the RI used accepted practices and followed EPA guidance.
- The revised FS is using the background values established in the RI, section 7. As you know, these reports are complementary to each other and the FS is building off of the data and data analysis provided RI. The purpose for determining bedded upriver sediment concentrations was that those values are considered to be representative of the concentrations of mobile sediment that are depositing in the upriver reach to be indicative of sediment concentrations that would deposit within the Study Area, uninfluenced by known or suspected sources within the Downtown reach and thus representative of concentrations in sediment resulting from disposition following successful implementation of source control measures. The LWG and EPA agreed to select specific areas where deposition was known to be occurring in this reach of the river for that purpose. The LWG's argument that EPA's RI directions on background were solely for the purposes of completing the RI Section 7 is puzzling, as the stated purpose of the RI Section 7 was to establish upriver bedded sediment background concentrations.

Regards,

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